

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
EASTERN DIVISION

CIVIL ACTION FILE NO. 4:16-CV-00289-FL

HARRY L. SMITH, JR.,)	
Plaintiff)	
)	
v.)	DEFENDANT'S APPENDIX TO
)	LOCAL CIVIL RULE 56.1
FLANDERS HOLDINGS LLC,)	STATEMENT OF UNDISPUTED
Defendant)	FACTS
)	

EXHIBIT	DESCRIPTION
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| 1. | Harry L. Smith, Jr. 6/2/2017 Deposition Transcript (with Exclusion of Sealed Portion at pp. 251–257) |
| 2. | Plaintiff's Responses to Defendant's First Set of Requests for Admissions, dated June 15, 2017 |
| 3. | Letter from Kevin Ceglowski to Phil Whitaker, dated Nov. 11, 2016, Exhibit 6 to Harry L. Smith, Jr. 6/2/2017 Deposition |
| 4. | Promissory Note, dated March 13, 2015, by Flanders Solutions, LLC in favor of Pronamic Industries, LLC, Exhibit 10 to Harry L. Smith, Jr. 6/2/2017 Deposition |
| 5. | Email Chain Between Plaintiff and Brad Buser, dated March 17, 2015, Exhibit 27 to Harry L. Smith, Jr. 6/2/2017 Deposition |
| 6. | Affidavit of Ryan McGary |
| 7. | Phillip L. Whitaker 5/16/17 Deposition Transcript |
| 8. | Email from Plaintiff to Peter Jones, dated November 10, 2015 (8:01 a.m.), Exhibit 41 to Harry L. Smith, Jr. 6/2/2017 Deposition |
| 9. | Email from Plaintiff to Phillip Whitaker, dated November 15, 2016 (6:48 p.m.), Exhibit 35 to Harry L. Smith, Jr. 6/2/2017 Deposition |

10. Email from Plaintiff to Phillip Whitaker, dated November 15, 2016 (8:33 p.m.), Exhibit 29 to Harry L. Smith, Jr. 6/2/2017 Deposition
11. Email from Plaintiff to Phillip Whitaker, dated November 21, 2016 (11:07 a.m.), Exhibit 34 to Harry L. Smith, Jr. 6/2/2017 Deposition
12. Email from Plaintiff to Phillip Whitaker, dated November 29, 2016 (7:34 a.m.), Exhibit 33 to Harry L. Smith, Jr. 6/2/2017 Deposition
13. Email from Plaintiff to Phillip Whitaker, dated December 24, 2016 (10:19 a.m.), Exhibit 32 to Harry L. Smith, Jr. 6/2/2017 Deposition
14. Email from Plaintiff to Phillip Whitaker, dated May 15, 2017 (3:09 p.m.), Exhibit 42 to Harry L. Smith, Jr. 6/2/2017 Deposition
15. Letter and Envelope from Plaintiff to Yoshihiro Mineno, envelope dated May 8, 2017, AAF International Corporate Office, Exhibit 43 to Harry L. Smith, Jr. 6/2/2017 Deposition

This the 14th day of July, 2017.

s/ S. McKinley Gray, III
S. McKinley Gray, III
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CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing
DEFENDANT'S APPENDIX TO LOCAL CIVIL RULE 56.1 OF UNDISPUTED FACTS with
the Clerk of the Court using the CM/ECF system which will send notification of such filing to
the following: Kevin M. Ceglowski, Esq.

This the 14th day of July, 2017.

s/ S. McKinley Gray, III
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ND: 4810-9398-8171, v. 1